

ETHICS PROGRAM INSPECTION REPORT

Agency: U.S. International Development Finance Corporation (DFC)

Report No.: 23-211

Date: March 31, 2023

Period Covered by Review: January 1, 2022 through December 31, 2022

UNITED STATES OFFICE OF GOVERNMENT ETHICS

Preventing Conflicts of Interest
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1.0 AGENCY DATA		
EMPLOYEES		
1.1	Number of full-time agency employees.	491
1.2	Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed.	0
1.3	Number of non-PAS public financial disclosure reports required to be filed.	41
1.4	Number of confidential financial disclosure reports required to be filed.	277
ETHICS PROGRAM		
1.5	Title of Designated Agency Ethics Official (DAEO).	Deputy General Counsel
1.6	Grade level of DAEO.	SL
1.7	Title of Alternate DAEO (ADAEO).	Senior Administrative Counsel
1.8	Grade level of ADAEO.	GS-15
1.9	Title of the primary, day-to-day ethics program administrator.	Agency: Senior Administrative Counsel OIG: Senior Attorney
1.10	Grade level of the primary, day-to-day ethics program administrator.	Agency: GS-15 OIG: GS-15
1.11	Current number of full-time ethics officials.	1
1.12	Current number of part-time ethics officials.	5
1.13	Number of reporting levels between the DAEO and the agency head.	2
COMMENTS		
1.2: The Chief Executive Officer's nominee report was the only PAS report required to be filed in 2022.		
1.9-1.10: While the DAEO and ADAEO retain overall authority and responsibility for DFC's ethics program, the agency's Office of Inspector General (OIG) administers most elements of the ethics program internally and apart from the rest of the agency. Ethics officials within the OIG provide ethics-related advice and counseling to and review financial disclosure reports submitted by OIG staff. However, OIG staff receive ethics training prepared and provided by ethics officials directly supervised by the DAEO and ADAEO.		

2.0 LEADERSHIP						
COMPLIANCE REQUIREMENTS				Yes	No	N/A
2.1	OGE has received an up-to-date designation from the agency head naming the DAEO. <i>See</i> 5 C.F.R. § 2638.107(a).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
2.2	OGE has received an up-to-date designation from the agency head naming the ADAEO. <i>See</i> 5 C.F.R. § 2638.107(a).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
COMMENTS						
None.						

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3.0 PUBLIC FINANCIAL DISCLOSURE (OGE Form 278e, OGE Form 278-T)					
COMPLIANCE REQUIREMENTS			Yes	No	N/A
The agency has written policies and procedures in place governing: <i>See</i> 5 U.S.C. app. IV, § 402(d)(1).					
3.1	• Collection of public financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.2	• Review/evaluation of public financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.3	• Public availability of public financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.4	The agency can demonstrate that late filing fees are collected or, where appropriate, waivers are issued when public filers do not timely file financial disclosure reports.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
3.5	Public financial disclosure reports are securely maintained. <i>See</i> OGE/GOVT-1.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.6	Public financial disclosure reports are retained in accordance with the retention requirements. <i>See</i> 5 C.F.R. § 2634.603(g)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.7	There is reasonable assurance that the lead human resources official or designee promptly (no later than 15 days after appointment) notifies the DAEO of all appointments to positions that require incumbents to file public financial disclosure reports. <i>See</i> 5 C.F.R. § 2638.105(a)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.8	There is reasonable assurance that the lead human resources official or designee promptly (no later than 15 days after termination) notified the DAEO of terminations of employees in positions that require incumbents to file public financial disclosure reports. <i>See</i> 5 C.F.R. § 2638.105(a)(2).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
DATA ANALYSIS			%		
3.9	Percentage of sampled non-PAS new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(b).	To be determined.			
3.10	Percentage of sampled non-PAS annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(a).	100%			
3.11	Percentage of sampled non-PAS termination reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(e).	100%			
3.12	Percentage of sampled non-PAS public financial disclosure reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	To be determined.			
3.13	Percentage of sampled non-PAS public financial disclosure reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	18%			
3.14	Percentage of sampled PAS annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(a).	N/A			
3.15	Percentage of sampled PAS termination reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(e).	N/A			
3.16	Percentage of sampled PAS annual and termination reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	N/A			
3.17	Percentage of sampled PAS annual and termination reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	N/A			
COMMENTS					
<p>3.4: No filer was granted a waiver or assessed the late filing fee.</p> <p>3.9, 3.12 OGE calculated the relevant percentages pending the receipt of additional information requested from ethics officials. Ethics officials provided additional information, but too late for OGE to assess and integrate into the report. OGE will consider the additional information and determine the percentages of reports filed and reviewed within 60 days of receipt during the follow-up review process.</p> <p>3.13: At the time of OGE's review, seven new entrant reports, one termination report, and one annual report filed in calendar year 2022 had not been certified. The ADAEO noted that DFC has a "significantly increased workload." More than 100 new regular employees in an agency of less than 500, resulted in increased training and filing of new entrant reports. This led to more work in reviewing new entrant reports as compared to annual and termination reports. In providing comments on OGE's draft report, ethics officials advised OGE that seven of nine reports filed in 2022 that had not been certified at the time of OGE's review had since been certified. OGE will examine all nine reports during its follow-up review.</p> <p>3.14-3.17: PAS reports in these categories were not required to be filed during the period covered by the inspection.</p>					

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4.0 CONFIDENTIAL FINANCIAL DISCLOSURE					
COMPLIANCE REQUIREMENTS			Yes	No	N/A
The agency has written policies and procedures in place governing: <i>See 5 U.S.C app. IV, § 402(d)(1).</i>					
4.1	• Collection of confidential financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.2	• Review/evaluation of confidential financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.3	Confidential financial disclosure reports are securely maintained. <i>See OGE/GOVT-2.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.4	Confidential financial disclosure reports are retained in accordance with the retention requirements. <i>See 5 C.F.R. § 2634.604.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.5	The agency's OGE-approved alternative confidential financial disclosure system complies with plans approved by OGE. <i>See 5 C.F.R. § 2634.905(a).</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
4.6	There is reasonable assurance that the lead human resources official or designee promptly (no later than 15 days after appointment) notifies the DAEO of all appointments to positions that require incumbents to file confidential financial disclosure reports. <i>See 5 C.F.R. § 2638.105(a)(1).</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
DATA ANALYSIS			%		
4.7	Percentage of sampled confidential new entrant reports filed timely. <i>See 5 C.F.R. § 2634.903(b).</i>				95%
4.8	Percentage of sampled confidential annual reports filed timely. <i>See 5 C.F.R. § 2634.903(a).</i>				100%
4.9	Percentage of sampled reports reviewed within 60 days of receipt. <i>See 5 C.F.R. § 2634.605(a).</i>				60%
4.10	Percentage of sampled confidential financial disclosure reports certified within 60 days of receipt. <i>See 5 C.F.R. §§ 2634.605(a) and 2634.909(a).</i>				34%
COMMENTS					
4.5: DFC does not have an OGE-approved alternative confidential financial disclosure system. 4.9-4.10: DFC's ADAEO noted that an increase in the size of the agency combined with the high percentage of DFC employees who file financial disclosure reports has burdened the Ethics Program.					

5.0 NOTICES TO PROSPECTIVE EMPLOYEES					
COMPLIANCE REQUIREMENTS			Yes	No	N/A
Written offers of employment for positions covered by the Standards of Conduct provide: <i>See 5 C.F.R. § 2638.303.</i>					
5.1	• A statement regarding the agency's commitment to government ethics.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5.2	• Notice that the individual will be subject to the Standards of Conduct and the criminal conflict of interest statutes as an employee.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5.3	• Contact information for an appropriate agency ethics office or an explanation of how to obtain additional information on applicable ethics requirements.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5.4	• Where applicable, notice of the time frame for completing initial ethics training.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5.5	• Where applicable, a statement regarding financial disclosure requirements and an explanation that new entrant reports must be filed within 30 days of appointment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5.6	The agency has established written procedures for issuing the notice to prospective employees. <i>See 5 C.F.R. § 2638.303(c).</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5.7	The agency's written procedures are reviewed by the DAEO each year. <i>See 5 C.F.R. § 2638.303(c).</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5.8	The agency can demonstrate that there is an effective process for ensuring all covered employees receive the required information with their written offer of employment. <i>See 5 C.F.R. § 2638.303.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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	COMMENTS
	<p>5.6, 5.7: The requirement for written procedures is largely predicated on the need to ensure continuity in the event an agency's experienced ethics officials are unavailable to administer the ethics program. It is important that an agency's written procedures explain in detail how the relevant process is administered.</p> <p>DFC did not have the required written procedures at the time OGE had completed the fieldwork for its inspection. Ethics officials advised OGE that they were coordinating with Human Resources management officials in developing the procedures. DFC's ethics officials submitted the written procedures at the same time they submitted their invited comments on OGE's inspection report. OGE examined the submitted written procedures and determined that they complied with relevant requirements.</p>

6.0 NOTICES TO NEW SUPERVISORS						
COMPLIANCE REQUIREMENTS				Yes	No	N/A
The agency must provide each employee upon initial appointment to a supervisory position with: <i>See 5 C.F.R. § 2638.306.</i>						
6.1	•	Contact information for the agency's ethics office.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6.2	•	The text of 5 C.F.R. § 2638.103.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6.3	•	A copy of, a hyperlink to, or the address of a Web site containing the Principles of Ethical Conduct.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6.4	•	Other information the DAEO deems necessary.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6.5		The agency has established written procedures for supervisory ethics notices. <i>See 5 C.F.R. § 2638.306(d).</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6.6		The agency's written procedures are reviewed by the DAEO each year. <i>See 5 C.F.R. § 2638.306(d).</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6.7		The agency can demonstrate that there is an effective process for ensuring that new supervisors receive the required information within one year of appointment. <i>See 5 C.F.R. § 2638.306(b).</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
COMMENTS						
<p>6.3,6.5-6.7: DFC did not have the required written procedures at the time OGE had completed the fieldwork for its inspection. Ethics officials advised OGE that they were coordinating with Human Resources management officials in developing the procedures. DFC's ethics officials submitted the written procedures at the same time they submitted their invited comments on OGE's inspection report. OGE examined the submitted written procedures and determined that they complied with relevant requirements.</p>						

7.0 INITIAL ETHICS TRAINING						
COMPLIANCE REQUIREMENTS				Yes	No	N/A
Each new employee of the agency subject to the Standards of Conduct must complete initial ethics training. <i>See 5 C.F.R. § 2638.304.</i>						
7.1		The training presentation(s) addressed concepts related to conflicts of interest, impartiality, misuse of position and gifts. <i>See 5 C.F.R. § 2638.304(e)(1).</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7.2		The agency provided new employees with either the following written materials or written instruction for accessing them: The summary of the Standards of Conduct distributed by the Office of Government Ethics or an equivalent summary prepared by the agency; provisions of any supplemental agency regulation that the DAEO determines to be relevant or a summary of those provisions; such other written materials as the DAEO determines should be included; instructions for contacting the agency's ethics officials. <i>See 5 C.F.R. § 2638.304(e)(2).</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7.3		The agency has established written procedures for initial ethics training. <i>See 5 C.F.R. § 2638.304(f).</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7.4		The agency's written procedures are reviewed by the DAEO each year. <i>See 5 C.F.R. § 2638.304(f).</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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	DATA ANALYSIS	%
7.5	Percentage of new employees who received initial ethics training. <i>See</i> 5 C.F.R. § 2638.304.	100%
7.6	Percentage of new employees who received initial ethics training within three months of appointment. <i>See</i> 5 C.F.R. § 2638.304(b).	100%
COMMENTS		
	None.	

8.0 ANNUAL ETHICS TRAINING							
COMPLIANCE REQUIREMENTS				Yes	No	N/A	
Each calendar year, public filers, confidential filers, and certain other employees must complete ethics training which meets specified requirements. <i>See</i> 5 C.F.R. §§ 2638.307 and 2638.308.							
8.1	The training presentation(s) addressed concepts related to financial conflicts of interest, impartiality, misuse of position and gifts. <i>See</i> 5 C.F.R. §§ 2638.307(e)(1) and 2638.308(f)(1).				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.2	The agency provided employees with either the following written materials or written instruction for accessing them: The summary of the Standards of Conduct distributed by the Office of Government Ethics or an equivalent summary prepared by the agency; provisions of any supplemental agency regulation that the DAEO determines to be relevant or a summary of those provisions; such other written materials as the DAEO determines should be included; instructions for contacting the agency's ethics officials. <i>See</i> 5 C.F.R. § 2638.304(e)(2).				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.3	The agency's annual ethics training complies with the formatting requirements for public filers, confidential filers, and certain other employees. <i>See</i> 5 C.F.R. §§ 2638.307(d) and 2638.308(e).				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.4	The agency's program for annual ethics training complies with the tracking requirements for public filers, confidential filers, and certain other employees. <i>See</i> 5 C.F.R. §§ 2638.307(f) and 2638.308(g).				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.5	The agency can demonstrate it has an effective process for ensuring covered public filers, other than those whose pay is set at Level I or Level II of the Executive Schedule, complete live annual ethics training at least once every two years. <i>See</i> 5 C.F.R. § 2638.308(e)(2).				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DATA ANALYSIS				Training Format			
				Live	Interactive		
Percentage of public filers who completed annual ethics training before the end of the calendar year. <i>See</i> 5 C.F.R. § 2638.308(a).							
8.6	<ul style="list-style-type: none"> • Executive Schedule Level I and Level II. <i>See</i> 5 C.F.R. § 2638.308(e)(1). 				N/A	N/A	
8.7	<ul style="list-style-type: none"> • Other PAS and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(2). 				100%	0%	
8.8	<ul style="list-style-type: none"> • SES and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(3). 				100%	0%	
Percentage of confidential filers and certain other employees who completed annual ethics training before the end of the calendar year. <i>See</i> 5 C.F.R. § 2638.307(a)(d).							
8.9	<ul style="list-style-type: none"> • Employees required to file an annual confidential financial disclosure report. <i>See</i> 5 C.F.R. § 2638.307(a)(1). 				99.6%	0%	
8.10	<ul style="list-style-type: none"> • Employees appointed by the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2). 				N/A	N/A	
8.11	<ul style="list-style-type: none"> • Employees of the Executive Office of the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2). 				N/A	N/A	
8.12	<ul style="list-style-type: none"> • Contracting officers described in 41 U.S.C. § 2101. <i>See</i> 5 C.F.R. § 2638.307(a)(3). 				Included in 8.9	Included in 8.9	
8.13	<ul style="list-style-type: none"> • Other employees designated by the head of the agency. <i>See</i> 5 C.F.R. § 2638.307(a)(4). 				N/A	N/A	

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COMMENTS	
	(8.6, 8.11, 8.13) DFC has no employees in these categories.

9.0 ETHICS ADVICE AND COUNSELING		Yes	No	N/A
COMPLIANCE REQUIREMENT				
9.1	Based on a sample collected by OGE, guidance provided by agency ethics officials to employees appears to be consistent with applicable laws and regulations. <i>See</i> 5 C.F.R. § 2638.104(c)(4).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS				
	None.			

10.0 SPECIAL GOVERNMENT EMPLOYEES (SGE) SERVING ON ADVISORY COMMITTEES AND BOARDS		Yes	No	N/A
Confidential Financial Disclosure				
10.1	Number of SGEs serving on Advisory Committees and Boards.		3	
DATA ANALYSIS			%	
10.2	Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b).		100%	
10.3	Percentage of sampled reports reviewed within 60 days of receipt but not later than the SGE's first meeting. <i>See</i> 5 C.F.R. § 2634.605(a).		100%	
10.4	Percentage of sampled reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).		100%	
Ethics Training				
COMPLIANCE REQUIREMENTS				
Required ethics training must be provided to each SGE. <i>See</i> 5 C.F.R. §§ 2638.304 and 2638.307.				
10.5	The training presentation(s) addressed concepts related to conflicts of interest, impartiality, misuse of position and gifts. <i>See</i> 5 C.F.R. § 2638.304(e)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10.6	The agency provided employees with either the following written materials or written instruction for accessing them: The summary of the Standards of Conduct distributed by the Office of Government Ethics or an equivalent summary prepared by the agency; provisions of any supplemental agency regulation that the DAEO determines to be relevant or a summary of those provisions; such other written materials as the DAEO determines should be included; instructions for contacting the agency's ethics officials. <i>See</i> 5 C.F.R. § 2638.304(e)(2).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DATA ANALYSIS			%	
10.7	Percentage of SGEs who received initial ethics training. <i>See</i> 5 C.F.R. § 2638.304.		100%	
10.8	Percentage of SGEs who received initial ethics training timely. <i>See</i> 5 C.F.R. § 2638.304(b)(2).		100%	
10.9	Percentage of SGEs who received annual ethics training. <i>See</i> 5 C.F.R. § 2638.307(d)(2).		100%	
COMMENTS				
	None.			

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ISSUES IDENTIFIED AND RESOLVED DURING THE INSPECTION

Element	ISSUE
5.6, 6.6	<p>ISSUE: During its inspection of DFC’s ethics program, OGE found that DFC did not have written procedures for providing the required notices to prospective employees and new supervisors. DFC submitted the written procedures along with their general comments on OGE’s report on the results of the inspection. OGE examined the submitted written procedures and determined that they complied with relevant requirements.</p> <p>AGENCY RESPONSE: The policy on DFC Ethics Office and the Office of Human Resources (OHRM) cooperation was identified as needing a complete rewrite in light of OHRM’s implementation of a new human resource management system in 2022. This interdepartmental coordination was underway at the time of OGE’s review and the Agency was able to incorporate OGE’s comments into the final policy. The final copy of this policy addresses this concern and has been provided to OGE along with the Agency’s responses.</p>

RECOMMENDATIONS

#	Element	RECOMMENDATION	Compliance Due
1	(3.13)	<p>RECOMMENDATION: Certify or otherwise close all public financial disclosure reports filed in calendar year 2022.</p> <p>AGENCY RESPONSE: OGE has identified nine reports which fall into this category. Of these nine reports, seven have been certified during the OGE inspection process. The remaining two are new entrant reports and the Ethics Office is actively working with the filer to ensure complete and accurate reporting.</p> <p>OGE COMMENT: OGE will examine all nine reports during its follow-up review.</p>	5/1/2023
2	(3.13)	<p>RECOMMENDATION: Ensure all public financial disclosure reports moving forward are reviewed and certified timely.</p> <p>AGENCY RESPONSE: DFC constantly endeavors to have the reviews done in the requisite time but the increased agency size and the individual circumstances of filers present challenges. The volume of agency growth and new hires has increased significantly and placed strain on the Ethics Program. In 2022 the agency welcomed over 100 new hires for an agency of less than 500 people—approximately half of those hires were new financial disclosure filers. Resources are prioritized to ensuring that new hires are aware of their ethics responsibilities and providing training and counseling to staff. In addition, due to DFC’s mission, employees include a high proportion of new hires entering the government for the first times as well as a high proportion of filing individuals, each of which brings an elevated level of Ethics Office resource burden. In addition, each individual filing requires a thorough review to ensure complete and accurate reporting and depending upon the filer’s circumstances, this review can require multiple conversations with the Ethics Office.</p> <p>OGE COMMENT: OGE will examine a sample of reports filed in 2023 during its follow-up review.</p>	8/1/2023
3	(4.9-4.10)	<p>RECOMMENDATION: Ensure confidential financial disclosure reports are reviewed and certified timely.</p> <p>AGENCY RESPONSE: Please see Agency Response to Item #2.</p> <p>OGE COMMENT: OGE will examine a sample of reports filed in 2023 during its follow-up review.</p>	5/1/2023

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in the Executive Branch

4	(5.6)	<p><u>RECOMMENDATION:</u> Ensure that the DAEO reviews the written procedures for providing required notices to prospective employees.</p> <p><u>AGENCY RESPONSE:</u> Now that the agency has a policy the policy will be reviewed by the DAEO on an annual basis.</p> <p><u>OGE COMMENT:</u> OGE will verify that the DAEO reviewed the policy during a follow-up review.</p>	1/30/24
5	(6.6)	<p><u>RECOMMENDATION:</u> Ensure that the DAEO reviews the written procedures for providing required notices to new supervisors and ensure all required content is provided to new supervisors.</p> <p><u>AGENCY RESPONSE:</u> Now that the agency has a policy, the policy will be reviewed by the DAEO on an annual basis.</p> <p><u>OGE COMMENT:</u> OGE will verify that the DAEO reviewed the policy during a follow-up review.</p>	1/30/24